



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

June 10, 2021

**VIA ECF**

The Honorable James L. Cott  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Caitlin H. Dickerson v. Customs and Border Protection*,  
19 Civ. 9017 (JLC)

Dear Judge Cott:

This Office represents U.S. Customs and Border Protection (“CBP”) in the above-referenced FOIA case. On behalf of the parties, we write to inform the Court that the parties have resolved the issues that were to be briefed in their forthcoming cross-motions for summary judgment. The parties are likewise submitting, under separate cover, a stipulation and proposed order that dismisses all of Plaintiff’s claims in this action, except for any claims for attorneys’ fees and costs by Plaintiff under 5 U.S.C. § 552(a)(4)(E).

We accordingly request that that the Court cancel the briefing schedule so-ordered by the Court regarding the parties’ previously anticipated cross-motions for summary judgment, *see* Dkt. Nos. 57-58. We also request that the Court set an August 31, 2021, deadline for any fee application by Plaintiff. The parties request this late August deadline so that they have sufficient time to attempt to resolve any fee dispute without need for court intervention.

We thank the Court for its consideration of this matter.

Respectfully,

AUDREY STRAUSS  
United States Attorney

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cc: Counsel for Plaintiff (via ECF)